

ECF CASE
JUDGE SCHEINDLIN

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

**J & J SPORTS PRODUCTIONS, INC., as
Broadcast Licensee of the May 5, 2007
DeLaHoya/Mayweather Program,**

Plaintiff,

-against-

NELLY OLMEDO BUCHELI, Individually,
and as officer, director, shareholder and/or
principal of OLMEDO OLMEDO INC. d/b/a
MOJITAS BAR & GRILL a/k/a MOJITAS
LOUNGE RESTAURANT a/k/a MOJITAS,

and

OLMEDO OLMEDO INC. d/b/a MOJITAS
BAR & GRILL a/k/a MOJITAS LOUNGE
RESTAURANT a/k/a MOJITAS,

Defendants.

PLEASE TAKE NOTICE that upon the affirmation of Julie Cohen Lonstein, sworn to
on the 2nd day of April 2008, in support of said application and the exhibits attached thereto,
Plaintiff moves this Court for an order granting the entry of default judgment against the
Defendants jointly and severally as follows:

**Against, NELLY OLMEDO BUCHELI, Individually, and as officer, director, shareholder
and/or principal of OLMEDO OLMEDO INC. d/b/a MOJITAS BAR & GRILL a/k/a
MOJITAS LOUNGE RESTAURANT a/k/a MOJITAS, and OLMEDO OLMEDO INC.
d/b/a MOJITAS BAR & GRILL a/k/a MOJITAS LOUNGE RESTAURANT a/k/a
MOJITAS,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN
THOUSAND DOLLARS (\$10,000.00)

- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of EIGHT HUNDRED TWENTY FOUR DOLLARS AND FIFTY CENTS (\$824.50)

Against, OLMEDO OLMEDO INC. d/b/a MOJITAS BAR & GRILL a/k/a MOJITAS LOUNGE RESTAURANT a/k/a MOJITAS,

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of EIGHT HUNDRED TWENTY FOUR DOLLARS AND FIFTY CENTS (\$824.50)

Dated: April 2, 2008
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein
Julie Cohen Lonstein
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